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Attorneys for Respondent
 Bombard Mechanical, LLC

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED ASSOCIATION OF JOURNEYMEN)
 AND APPRENTICES OF THE PLUMBING &)
 PIPE FITTING INDUSTRY OF THE)
 UNITED STATES AND CANADA, LOCAL)
 525, LAS VEGAS, NEVADA AFL-CIO,)
)
 Petitioner,)
)
 vs.)
)
)
 BOMBARD MECHANICAL, LLC, a Nevada)
 Limited Liability Company, and DOES I-V,)
 ROES VI-X;)
)
 Defendant.)

Case No. 2:19-cv-00431-JAD-DJA

**STIPULATION AND ORDER TO
 EXTEND TIME TO FILE RESPONSE
 TO MOTION TO CONFIRM
 ARBITRATION AWARD AND
 REDUCE TO JUDGMENT AND TO
 EXTEND TIME TO REPLY TO THE
 SAME**

(First Request)

ECF No. 31

Pursuant to LR 6-1, Petitioner, United Association of Journeymen and Apprentices of the Plumbing & Pipe Fitting Industry of the United States and Canada, Local 525, Las Vegas, Nevada AFL-CIO (“Union”) and Respondent, Bombard Mechanical, LLC (“Bombard”), by and through their respective counsel of record, stipulate and request that the Court extend the deadline for Bombard to respond to the Motion to Confirm Arbitration Award and Reduce to Judgment (“Motion”) from the current deadline of January 4, 2023 up to and including January

1 13, 2023, as well as extend the Union's deadline to file its Reply from January 20, 2023 up to
2 and including January 30, 2023.

3 In support of this Stipulation and Request, the parties state the following:

4 1. Petitioner filed its Motion on December 21, 2022. Accordingly, Bombard's
5 response to the Motion is currently due by January 4, 2023.

6 2. On December 23, 2022, Bombard requested an additional nine (9) days to respond
7 to the Motion. On December 26, 2022, Petitioner agreed to Bombard's request so long as
8 Petitioner is allotted the same amount of additional time to file its Reply. Bombard does not
9 oppose Petitioner's request for equal time. Accordingly, if approved by the Court, the new
10 deadline for Bombard to respond to the Motion would be January 13, 2023 and Petitioner's
11 Reply would then be due sixteen (16) days later on January 30, 2023.

12 3. This request is brought in good faith and not sought for the purpose of delay or
13 any other improper purpose. Rather, this request is sought to provide Bombard's counsel
14 sufficient time to review and respond to the issues raised in the Motion in light of the intervening
15 Hannukah, Christmas and New Year's Eve holidays, and the related out of state travel by Edwin
16 Keller, which commenced on December 21, 2022, who is not scheduled to return to work until
17 January 2, 2023.

18 4. This is the first request to extend the deadline to respond to the Motion and to
19 reply to Bombard's response. No previous extensions of time have been granted.
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1 WHEREFORE, the parties respectfully request that the Court extend the deadline for
2 Bombard to respond to the Motion from the current deadline of January 4, 2023, up to and
3 including January 13, 2023, and correspondingly extend Petitioner's deadline to reply through
4 January 30, 2023.

5
6 DOBBERSTEIN LAW GROUP

KAMER ZUCKER ABBOTT

7
8 By: /s/ Eric Dobberstein
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Attorneys for Respondent

16 **ORDER**

17 IT IS SO ORDERED.

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19 _____
20 DISTRICT COURT JUDGE
21 12/29/22
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